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Ref: 8EPR-EP

MEMO

TO: Luke Chavez, Site Assessment Manager

FROM: Carol Russell, Mining Team Leader

RE: Comments on the Site Reassessment, Rico-Argetine, Rico, Dolores County, Colorado
CERCLIS ID# COD980952519 by URS Operating Services., Inc.

Thanks you for giving me the opportunity to comment on the draft site reassessment on the Rico-Argetine site.

Overall the report was well done however specific corrections should be made to the report. My comments are limited to the technical aspects of this report.

Page 2 - paragraph 2 - first sentence

The area surrounding the Rico-Argetine site is primarily U.S. Forest Service not BLM.

paragraph 3 - second sentence

The two hot ponds are not springfed but are fed by **discharging drill holes**. This mischaracterization can be found throughout the report.

paragraph 3 - third sentence

Only some of the water from the underground mine workings at the Rico - Argetine site flows into the St. Louis **Tunnel**. (Note this is a tunnel not an adit.) Also there are multiple mines not just one.

Page 3 - paragraph 2 - second sentence


When was the crosscut from the Argetine Mine to the St. Louis **Tunnel** completed?



Page 3 cont.

paragraph 2 - last sentence

Many of the mine workings are not connected to the St Louis **Tunnel**. Also, even if they are connected not all of the water may drain through the Tunnel.

 Page 4 - paragraph 1

What is the history and status of mining permits through the Colorado Division of Minerals and Geology?

paragraph 2 - third sentence

What is the reference for the dilution of the leachate from the **Rico - Argentine** tailings? Currently there is very little dilution occurring.

Page 5 - paragraph 3 - fourth sentence

Natural background mercury has not been documented in the site area. This sentence is misleading. I recommend removing it.

Page 6 - paragraph 3

In this paragraph the Walsh Report is summarized.. However, data from the report is not shown on the referenced table 23. Both the copper numbers and any detection of mercury should be shown on the table and discussed in the narrative.

Page 7 - paragraph 3

The term Classic as it refers to the Emergency Removal Action is unnecessary.

Page 8 - paragraph 3

Why aren't leaking underground storage tankd, pesticides, hydrocarbon contamination, asbestos containing buildings and potential for PCBs discussed in this report?

Page 9 - paragraph 3 - first sentence

Field observations show that not all exploratory drill holes were capped as noted the hot [springs] near the St Louis ponds are uncapped drill holes.

Page 10 - paragraph 1

Graphs of the Dolores River hydrographs and precipitation for the period of record would be very useful.

Page 10 - paragraph 3

Does a site assessment only target one source (in this case mining) in the report?

Page 11 - paragraph 3 - first sentence

This refers to only 20 mines being active in the Rico area. I have observed the evidence for more. What is the reference?

- second sentence

What is the source of information of the use of waste rock for street cover?

Page 12 - paragraph continued from previous page - third sentence

In reference to the Blaine Adits, waters were being discharged from seeps nearby the Blaine Adit not from the adit itself.

paragraph 2

References to a geothermal spring need to be changed to a discharging drill hole.

paragraph 3

What were the concentrations of cyanide that were significantly greater than background and what were the sampling locations?

Page 14 - paragraph 1

Note again the reference to a geothermal spring should be changed to a discharging drill hole. (Typo - benchmarks not benchmarks)

Page 19 - paragraph 1 - first sentence

There are no **public** drinking water intakes. Please add the word public.

- paragraph four - first sentence

Wetlands have been observed along Silver Creek.

Page 21 - paragraph 1 - third sentence

Which sample is considered background? Based upon the locations on the associated map any of these sites could be contaminated by anthropogenic activities.

Page 24 - paragraph 3

The well at the Rico Ranger Station is downstream of some abandoned mines but is the farthest upstream from the town of Rico.

Page 25 - paragraph two - third sentence

Drinking water data should be available from CDPHE for this public drinking water supply.

paragraph 4

If mine waste rock was used as road or street base in the Town of Rico, Dust from unpaved streets could be a significant source. This is a major data gap in the presented information.

Figure 4

The wetlands delineation on this map do not correspond to the AHI maps. This map should be revised.